



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

NOV 18 2008

The Honorable Bill Shuster  
Member, U.S. House of Representatives  
647 Philadelphia Street, Suite 303  
Indiana, Pennsylvania 15701

Dear Congressman Shuster:

Thank you for your letter of October 8, 2008, to the U.S. Environmental Protection Agency (EPA) on behalf of your constituent, (b) (6), concerning an EPA requirement for water testing for his business, the Starford Inn Bar. Specifically, Mr. (b) (6) is concerned that similar testing is already being conducted and that the additional costs will force the business into bankruptcy.

The tests in question are required of the Starford Inn Bar under the Long Term 2 Enhanced Surface Water Treatment Rule (LT2), promulgated in January 2006. These tests are intended to gage the level of risk for waterborne illness from pathogens that are resistant to typical disinfection practices. The basic requirement for water systems serving fewer than 10,000 people, such as the Starford Inn Bar, is to sample the raw, untreated water source every two weeks for one year and analyze the samples for the bacterium *E. coli*. (*E. coli* is used as an indicator organism for the potential presence of *Cryptosporidium*, a disinfectant-resistant microbial contaminant that has caused disease outbreaks in several cities across the United States.) These tests cost about \$25 per sample.

At the end of the year, the average *E. coli* concentration of the 26 samples is calculated. If the average concentration of *E. coli* is greater than a specified trigger level, then the system must monitor for *Cryptosporidium*. Because the costs of *Cryptosporidium* analysis are considerably more (as much as \$500 per sample) than *E. coli* analysis, the initial sampling for *E. coli* was established to reduce expenses for smaller water systems. Although the testing is an added cost for a small business, it is necessary to ensure that the customers of Starford Inn Bar are being provided with water that has minimal risk of containing disease-causing organisms and meets all drinking water regulations.

Mr. (b) (6) indicates that testing of the Starford Inn Bar water system has been ongoing for three years. Mr. (b) (6) is likely referring to routine sampling of the distribution system that is required to ensure that the water is being properly disinfected. This testing is distinct from the *E. coli* and *Cryptosporidium* testing described above.



If you have any questions, please do not hesitate to contact me or have your staff contact Mrs. Megan Mackey, EPA's Pennsylvania Liaison, at 215-814-5534.

Sincerely,

A handwritten signature in cursive script that reads "Donald S. Welsh".

Donald S. Welsh  
Regional Administrator

